

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ADRIAN LOPEZ, Derivatively and on  
behalf of GLOBAL DIGITAL SOLUTIONS,  
INC.

Plaintiff,

v.

WILLIAM J. DELGADO, RICHARD J.  
SULLIVAN, DAVID A. LOPPERT,  
JEROME J. GOMOLSKI, STEPHANIE C.  
SULLIVAN, ARTHUR F. NOTERMAN,  
AND STEPHEN L. NORRIS,

Defendants,

and

GLOBAL DIGITAL SOLUTIONS, INC.,

Nominal Defendant.

Case No. 3:17-cv-03468-PGS-LHG

Hon. Peter G. Sheridan  
Hon. Lois H. Goodman

**DECLARATION OF TIMOTHY W. BROWN IN SUPPORT OF PLAINTIFF ADRIAN  
LOPEZ'S MOTION TO REMAND AND IN RESPONSE TO DEFENDANTS  
WILLIAM J. DELGADO'S AND DAVID A. LOPPERT'S MOTIONS TO DISMISS**

I, Timothy W. Brown, an attorney duly admitted to practice before the Courts of the State of New York, hereby affirm the truth of the following statements, upon information and belief, under the penalty of perjury:

1. I am the managing attorney at The Brown Law Firm, P.C., counsel with Vik Pawar, Esq. of Pawar Law Group P.C. for Plaintiff Adrian Lopez in the above-captioned derivative action.

2. I respectfully submit this declaration in support of Plaintiff Adrian Lopez's Motion to Remand and in Response to Defendants William J. Delgado's and David A. Loppert's

Motions to Dismiss. I am above the age of 18 and have personal knowledge of the matters stated herein, and if called as a witness, I could and would competently testify thereto.

3. Attached hereto as Exhibit A is a true and correct copy of the Verified Second Amended Shareholders' Derivative Complaint And Jury Trial Demand, Document No. 12, filed in *Fagin v. Gilmartin*, Case 2:03-cv-02631-SRC-CCC (D.N.J. filed August 5, 2013).

Executed this 14th day of June 2017

/sTimothy Brown  
Timothy W. Brown